LAW OFFICES OF RICHARD A. FOGEL, P.C.

AV RATED/BEST'S RECOMMENDED INSURANCE ATTORNEY

RICHARD A. FOGEL, ESQ. 389 CEDAR AVENUE ISLIP, N.Y. 11751-4627 (516) 721-7161 (631) 650-5254 (FAX) RFOGEL@RFOGELLAW.COM

Insurance Coverage, Toxic Torts, Environmental,
Product Liability & Commercial Litigation
New York & New Jersey
www.rfogellaw.com

January 23, 2023

VIA DNJ ECF

Hon. Leda Dunn Wettre United States District Court for the District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, N.J. 07101

Re: Sawhney v. Chubb Insurance Company of New Jersey

Docket No. 2:21-cv-14675-KSH-LDW

Your Honor:

This firm represents the plaintiffs in the above referenced insurance coverage litigation. This letter is in response to the court order for a concise status report following the mediation on January 19, 2023.

We appeared for the mediation via Zoom on January 19, 2023 with our clients as did Chubb. After several hours, we were told by the mediator that Chubb requested further information in the form of excel spread sheets in order to get settlement authorization. We agreed to do so for the purposes of settlement only. The mediator suggested a schedule for both sides to provide and exchange the spread sheet through the mediator which she memorialized in a proposed draft consent order which will be submitted to the court that was exchanged today between the parties with comments. I understand the mediator is not available today, so we await her response to the comments before we can submit the proposed consent order to the court. My understanding is that the mediation will resume on April 18 after the exchange of the spread sheet information.

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Thank you for your time and consideration.

Respectfully submitted,

Richard A. Fogel

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cc: Cynthia Bernstiel, Esq., by ECF